



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 23 2016

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7642 3144**  
**RETURN RECEIPT REQUESTED**

Mr. Dennis A. Taylor  
Quality Manager, Safety II  
Keener Corporation  
419 East 10th Street  
Connersville, Indiana 47331

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA I.D. No.: IND990735219

Dear Mr. Taylor:

On June 15, 2016 a representative of the U.S. Environmental Protection Agency inspected the Keener Corporation facility located in Connersville, Indiana. As a large quantity generator of hazardous waste, Keener Corporation is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Keener Corporation's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Keener Corporation, EPA's review of records pertaining to Keener Corporation, and the inspector's observations, EPA has determined that Keener Corporation has unlawfully stored hazardous waste without a permit or interim status as a result of Keener Corporation's failure to comply with certain conditions for a permit exemption under 40 C.F.R. §§ 262.34(a)-(c), which are incorporated by reference into the Indiana Administrative Code (IAC) at 329 IAC 3.1-7-1. EPA has identified the permit exemption conditions with which Keener Corporation was out of compliance at the time of the inspection in paragraphs 1 and 2 below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from 40 C.F.R. Part 265, which is incorporated by reference at 329 IAC 3.1-10-1, the generator: (a)

becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1 and 2 are also independent TSD requirements incorporated from 40 C.F.R. Part 265. Accordingly, each failure of Keener Corporation to comply with these conditions are also violations of the corresponding requirements in 40 C.F.R. Part 265 (if the facility should have fully complied with the requirements for interim status), or 40 C.F.R. Part 264, which is incorporated by reference at 329 IAC 3.1-9-1 (if the facility should have been permitted).

Also, EPA has determined that Keener Corporation violated RCRA requirements regarding Biennial Reporting as described in paragraph 3 below.

### **Keener Corporation's Hazardous Waste Generator Status**

The regulatory requirements of 40 C.F.R. Part 262, incorporated by reference at 329 IAC 3.1-7-1, for which a hazardous waste generator is subject to, depends on the amount of hazardous waste generated at the facility in a calendar month. There are three classifications of hazardous waste generators under the RCRA regulatory structure, commonly referred to as: (1) conditionally exempt small quantity generators (CESQGs); (2) small quantity generators (SQG); and (3) large quantity generators (LQGs).

CESQGs are generators that generate 100 kg (220 lb.) or less of hazardous waste in a calendar month. CESQGs are exempt from all RCRA hazardous waste regulatory requirements except those identified at 40 C.F.R. § 261.5, incorporated by reference at 329 IAC 3.1-6-1. In order to maintain the CESQG exemption, the generator cannot accumulate hazardous waste on-site in quantities equal to or greater than 1000 kg (2,200 lb.) at any time.

Keener Corporation identified itself as a CESQG in its most recent Hazardous Waste Handler Identification form submitted to the Indiana Department of Environmental Management (IDEM) on or about April 11, 2002, under the signature of Mr. Mark Keener, Senior Vice President. However, EPA has reviewed hazardous waste manifest records for off-site shipments from Keener Corporation to Safety-Kleen Systems, Inc., Smithfield, Kentucky (EPA I.D. No.: KYD053348108) and Clean Harbors El Dorado, LLC, El Dorado, Arkansas, (EPA I.D. No.: ARD069748192), for the time period of June 18, 2013 through May 3, 2016. These records demonstrate that during the period of review, Keener Corporation repeatedly accumulated hazardous waste on-site in quantities greater than 1000 kilograms (2,200 pounds), and was therefore not eligible for the CESQG exemption.

Specifically, on June 18, 2013, Keener Corporation shipped a total of 27,300 pounds of hazardous waste (three separate manifests). On September 19, 2013, Keener Corporation shipped a total of 4,600 pounds of hazardous waste (two separate manifests). On May 27, 2014, Keener Corporation shipped a total of 2,700 pounds of hazardous waste. Keener Corporation had a total of six separate shipments of hazardous waste in 2015. Each shipment ranged between 3,200 and 8,000 pounds. As of May 3, 2016, Keener Corporation had three off-site shipments of hazardous waste in the current calendar year. Each shipment ranged between 4,400 and 8,400 pounds.

SQGs are those facilities that generate greater than 100 kilograms (220 lbs.) but less than 1000 kilograms (2,200 lbs.) of hazardous waste in a calendar month. SQGs are subject to many of the generator standards of 40 C.F.R. Part 262 (e.g., manifest requirements, container management, storage time limits) but are exempt from others (e.g., biennial reporting requirements, contingency planning, written training program). However, an SQG cannot accumulate hazardous waste on-site in quantities greater than 6,000 kilograms (13,200 lbs.). If an SQG accumulates hazardous waste on-site in excess of 6,000 kilograms (13,200 lbs.), the generator becomes an operator of a hazardous waste storage facility and is subject to the requirements of 40 CFR parts 264, 265 and 267, and the RCRA permit requirements of 40 CFR part 270. The manifest record review demonstrates that on June 18, 2013, Keener Corporation had accumulated 27,300 pounds of hazardous waste on-site.

LQGs are those facilities which generate 1000 kilograms (2,200 lbs.) or more of hazardous waste in a calendar month. LQGs must comply with all applicable requirements for generators of hazardous waste at 40 C.F.R. Part 262. Considering the 1000 kilogram regulatory threshold, the largest amount of hazardous waste a facility could generate in a calendar year without being classified as a large quantity generator in any month of that year is less than 12,000 kilograms (i.e., 12 months \* 1000 kg/month) or 26,400 pounds. Keener Corporation shipped 40,200 pounds of hazardous waste off-site in 2013, during a six month period from June 18 through December 12, 2013. Keener Corporation shipped 35,200 pounds off-site in 2015, during an 11 month period from January 9 through November 25, 2015.

As of May 3, 2016, Keener Corporation had three shipments of hazardous waste in the current calendar year, totaling 19,200 lbs. On March 24, 2016, Keener Corporation shipped 6,400 pounds of hazardous waste off-site. Thirty-nine (39) days later, on May 3, 2016, Keener Corporation shipped an additional 8,400 pounds of hazardous waste off-site, corresponding to an average generation rate of 2,800 pounds per calendar month for the time period of March 25 through May 3, 2016 (i.e., 8,400 pounds / 3 months), greater than the threshold for classification as an LQG.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, Keener Corporation was out of compliance with the following large quantity generator permit exemption conditions, which are also independent TSD requirements violated by Keener Corporation.

##### **1. Training**

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management

procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See*, 40 C.F.R. §§ 262.34(a)(4) and 265.16(a), incorporated by reference at 329 IAC 3.1-7-1 and 3.1-10-1. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See*, 40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c), incorporated by reference at 329 IAC 3.1-7-1 and 3.1-10-1.

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See*, 40 C.F.R. §§ 262.34(a)(4) and 265.16(d), incorporated by reference at 329 IAC 3.1-7-1 and 3.1-10-1.

At the time of the inspection, Keener Corporation did not have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA.

## 2. Contingency Planning

A large quantity generator must have a written contingency plan, which includes, among other items:

- A description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 C.F.R. § 265.37;
- The names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 40 C.F.R. § 265.55), and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates;

- A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities; and
- An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires).

At the time of the inspection, the EPA inspector requested of Keener Corporation representative Mr. Dennis Taylor, to review a copy of Keener Corporation's contingency plan. In response, Mr. Taylor provided a "Slug Control Plan." The Slug Control Plan did not include: (1) a description of arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, (2) the home addresses of emergency coordinators, and (3) an evacuation plan for facility personnel. Also, though a list of emergency equipment on hand was included, the location of the equipment was noted only by department, as opposed to the specific location.

**Summary:** By failing to comply with the conditions for a permit exemption, above, Keener Corporation became an operator of a hazardous waste storage facility, and was required to obtain an Indiana hazardous waste storage permit. Keener Corporation failed to apply for such a permit. Keener Corporation's failure to apply for and obtain a hazardous waste storage permit violated the requirements of 329 IAC 3.1-13-1 and 3.1-13-3(a) and (d) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from 40 C.F.R Part 265, incorporated by reference at 329 IAC 3.1-10-1, is also an independent violation of the corresponding TSD requirement.

### **OTHER VIOLATIONS**

Keener Corporation violated the following generator requirements:

#### **3. Hazardous Waste Reporting**

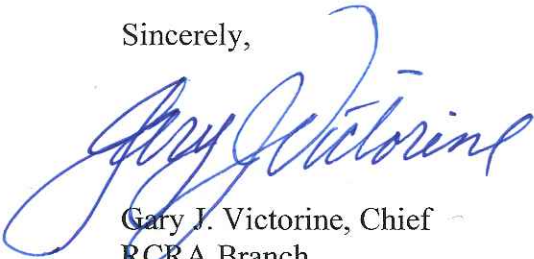
Under 329 IAC 3.1-7-14(a) [40 C.F.R. § 262.41(a)], a generator of hazardous waste who ships hazardous waste off-site to a treatment, storage, or disposal facility within the United States must prepare and submit a biennial report to IDEM, on forms provided by the IDEM Commissioner, no later than March 1<sup>st</sup> of each even-numbered year. These biennial reports provide information regarding the amount of hazardous waste generated

and transported off-site by the generator in the previous odd-numbered year (among other things). Keener Corporation did not submit biennial reports to IDEM in 2014 and 2016 (regarding hazardous waste generation/shipment in 2013 and 2015, respectively).

At this time, EPA is not requiring Keener Corporation to apply for an Indiana hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 and 2, above. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and reporting requirements. You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091 or at [brown.todd@epa.gov](mailto:brown.todd@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Nancy Johnston, IDEM ([njohnsto@idem.in.gov](mailto:njohnsto@idem.in.gov))





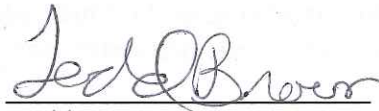
U. S. Environmental Protection Agency  
Region 5, Land and Chemicals Division  
RCRA Branch  
77 West Jackson Boulevard  
Chicago, Illinois 60604

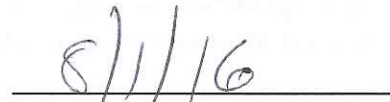
## RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Keener Corporation  
**EPA ID NUMBER:** IND990735219  
**ADDRESS:** 419 East 10<sup>th</sup> Street  
Connersville, Indiana 47331  
**DATE OF INSPECTION:** June 15, 2016


**EPA INSPECTOR:** Todd C. Brown  
Environmental Scientist

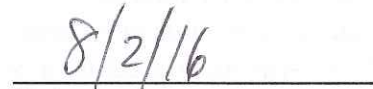
**PREPARED BY:**

  
Todd C. Brown  
Compliance Section 1

  
Date 8/1/16

**APPROVED BY:**

  
Michael Cunningham, Chief  
Compliance Section 1

  
Date 8/2/16

## **I. PURPOSE OF INSPECTION**

The purpose of this inspection was to evaluate the compliance of Keener Corporation, Connersville, Indiana with federal and state regulations at 40 C.F.R. Parts 260 through 279, and 329 IAC Articles 3.1 and 13, regarding the treatment, storage and disposal of hazardous waste and used oil.

## **II. PARTICIPANTS**

### ***Inspector(s):***

Todd Brown  
Environmental Scientist  
U.S. EPA

### ***Site Representative(s):***

Dennis Taylor  
Quality Manager  
Keener Corporation

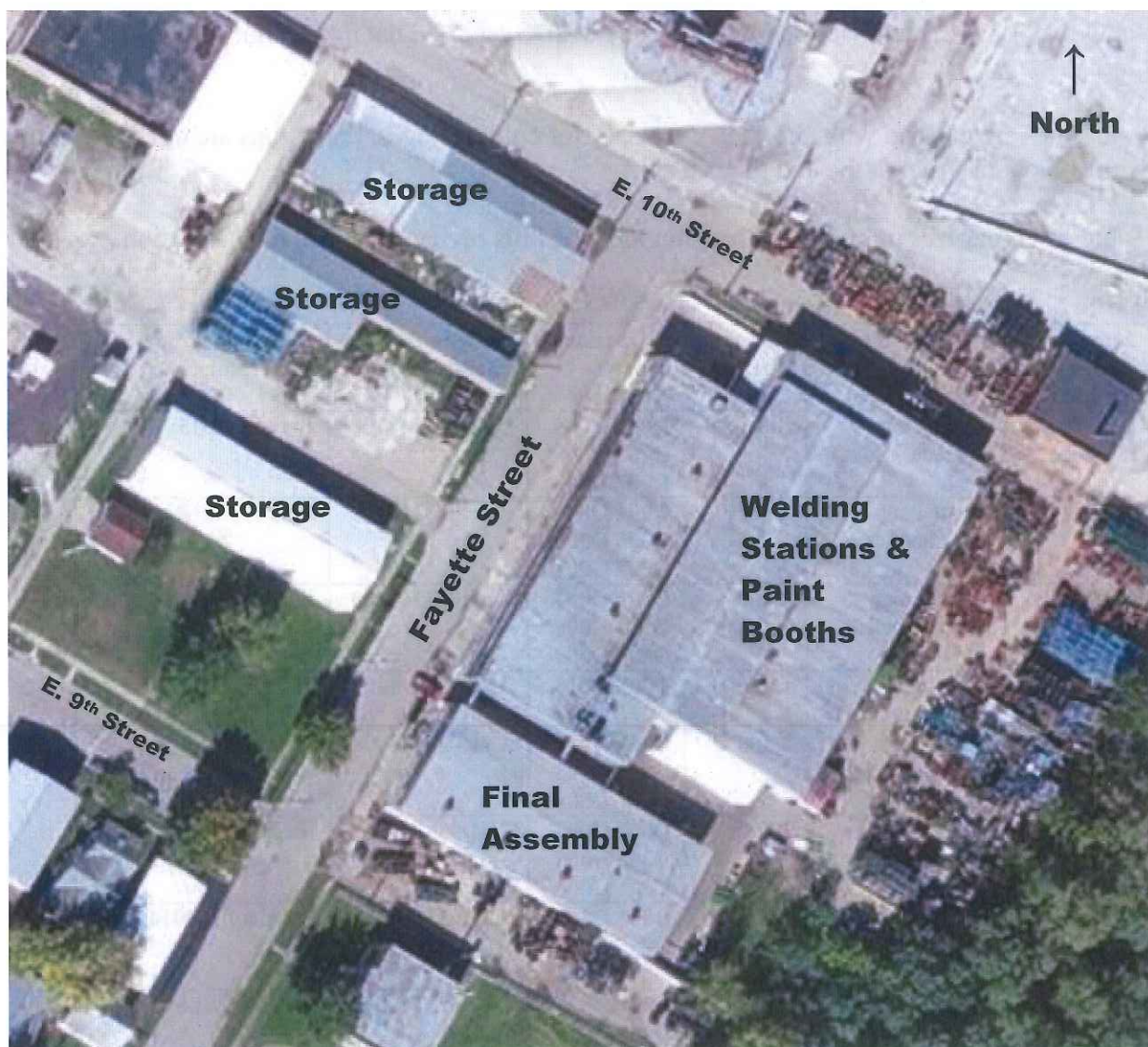
## **III. SITE DESCRIPTION**

Keener Corporation (Keener) manufactures steel racks for the automotive industry. The manufacturing processes at this site consist of the cutting, welding and painting of steel. There are four paint booths at the facility. Manufacturing operations take place in Keener's two main buildings on the east side of Fayette Street (Figure 1). Three additional buildings across the street are used for storage (one is a three-walled structure under roof).

In December of 1992, Keener submitted a Notification of Regulated Waste Activity identifying itself as a large quantity generator of hazardous waste (LQG). In 1993, Keener wrote a letter to the Indiana Department of Environmental Management (IDEM) advising that it was a small quantity generator of hazardous waste (SQG). On April 11, 2002, Keener submitted a Hazardous Waste Handler Identification form to IDEM identifying itself as a conditionally exempt small quantity generator of hazardous waste (CESQG). However, Biennial Reports submitted by RCRA-permitted treatment, storage and disposal facilities, which receive hazardous waste from Keener, indicate that Keener was an LQG in 2013.

The EPA had not previously inspected Keener for compliance with RCRA. IDEM last inspected Keener for RCRA compliance in 1998.





**Figure 1.** Keener Corporation. 419 East 10<sup>th</sup> Street, Connorsville, Indiana.

#### **IV. OPENING CONFERENCE AND MANIFEST REVIEW**

The inspector arrived at Keener on June 15, 2016, at approximately 9:30 A.M. Upon arrival, he introduced himself to a Mr. Keener (first name not noted), presented his credentials, and explained the purpose of the inspection. Mr. Keener introduced the inspector to Mr. Dennis Taylor, Quality Manager. The inspector proceeded to interview Mr. Taylor regarding facility operations and waste generation. The inspector also reviewed hazardous waste manifest records for 2013 through 2016; and a material safety data sheet (MSDS) for paint used by Keener. Mr. Keener was only present for a brief portion of this conference, having left to attend other matters.

The Keener representatives stated that only water-based paints are used. Paint waste is reportedly shipped off-site every six weeks by Safety Kleen Systems, Inc. Mr. Taylor estimated a couple thousand pounds were generated each month. Mr. Taylor provided the inspector with an MSDS for paint used by Keener. The MSDS identified the material as Aquapon High Build White Base

– CO A, 97-1212, manufactured by PPG. The MSDS reported the flash point at 23 °F (closed cup).

Paint lines are cleaned with air when necessary for color changes. Paint guns are either cleaned with solvent or water at the end of each shift.

Table 1 summarizes information from manifest records reviewed during the inspection.

**Table 1. Manifest Information**

Manifest Document Number	Waste Name	Amount (lbs.)	Hazardous Waste Numbers	Designated Facility I.D.	Date Signed by Generator
Not recorded	Waste Paint (toluene/xylene)	Illegible	D001 D004 D005 D006 D007 D008	KYD053348108 <sup>1</sup>	June 16, 2013
003814625	Waste Paint (toluene/xylene)	12,600	D001 D004 D005 D006 D007 D008	KYD053348108	June 18, 2013
003814626	Waste Paint (toluene/xylene)	9,100	D001 D004 D005 D006 D007 D008	KYD053348108	June 18, 2013
003814920	Hazardous Waste Liquid	1,800	D008 D018	ARD069748192 <sup>2</sup>	September 19, 2013
003893577	Waste Paint (toluene/xylene)	2,800	D001 D004 D005 D006 D007 D008	KYD053348108	Illegible
003893652	Waste Paint (toluene/xylene)	2,000	D001 D004 D005 D006 D007 D008	KYD053348108	Illegible
003893946	Waste Paint (toluene/xylene)	1,200	D001 D004 D005 D006 D007 D008	KYD053348108	February 7, 2014
004098482	Waste Paint (toluene/xylene)	2,000	D001 D004 D005 D006 D007 D008	KYD053348108	June 24, 2014
004372665	Waste Paint (toluene/xylene)	1,200	D001 D004 D005 D006 D007 D008	KYD053348108	August 18, 2014
004372799	Waste Paint (toluene/xylene)	4,800	D001 D004 D005 D006 D007 D008	KYD053348108	October 8, 2014
005009388	Waste Paint (toluene/xylene)	6,800	D001 D004 D005 D006 D007 D008	KYD053348108	November 25, 2015
005349605	Waste Paint (toluene/xylene)	8,400	Illegible	KYD053348108	May 13, 2016

Additional 2015 manifest records were on-file. However, the available copies were illegible, and are therefore not included in the table above.

<sup>1</sup> Safety Kleen Systems, Inc., 3700 Lagrange Road, Smithfield, Kentucky.

<sup>2</sup> Clean Harbors El Dorado, LLC, 309 American Circle, El Dorado, Arkansas.

## **V. SITE TOUR**

The inspector toured the site with Mr. Taylor. Numerous welding stations and four paint booths are located in a single building noted on Figure 1 (photographs 3 – 6). Paint booths were in operation at the time of the inspection. One 55-gallon container of paint waste was located in close proximity to a paint booth (photograph 1). The container was affixed with a product label, which identified the material as Aquacron WR Alkyd Gloss Ultra Deep Base (photograph 2). The container was closed and in good condition. Mr. Taylor stated Keener generates six to eight containers of this waste per month, depending on how often paint lines are flushed.

A small accumulation of refuse was located in an outdoor area in proximity to the Final Assembly Building. Gas cylinders were among the accumulation (photographs 7 and 8). Mr. Taylor stated the cylinders had contained argon and nitrogen gas.

The inspector observed two drums located in an outdoor storage area (photographs 9). Both containers appeared heavy to the touch. At the time of the inspection, Mr. Taylor was unaware of their contents. Both drums were affixed with product labels. The inspector could not photograph the labels, as the containers were positioned in close proximity to each other, with the labels turned inward. Nonetheless, the labels identified the materials as: "Isocyanate DOW 3019" and "Dow Styrofoam Mix 2030 Poly 01."

## **VI. RECORDS REVIEW**

The inspector and Mr. Taylor returned to the office area at the conclusion of the tour. At this time, the inspector asked for Mr. Taylor's opinion on Keener's hazardous waste generator status (i.e., CESQG, SQG or LQG). Mr. Taylor responded that he had not previously considered the topic.

The inspector inquired as to whether Keener maintained a hazardous waste contingency plan. In response, Mr. Taylor provided a Slug Control Plan. The plan describes response activities in the event of a spill of MV 880 Water Reducible Alkyd Enamel. The plan identifies emergency coordinators (ECs), including home and work telephone numbers. EC home addresses are not included in the plan. The plan includes a list of emergency equipment, with locations identified by department. More precise locations are not included (e.g., locations designated on a map). The plan does not: describe arrangements with local authorities/emergency responders pursuant to 40 C.F.R. § 265.34; or include an evacuation plan for facility personnel.

Mr. Taylor explained that the fire department attempted to make arrangements to visit the facility approximately 2 years ago, though did not follow through. The proposed meeting was reportedly initiated by the fire department itself.

The inspector asked Mr. Taylor if Keener provides annual training for employees with duties regarding hazardous waste management. Mr. Taylor responded that it did not.

Keener does not maintain records of inspections of hazardous waste storage areas. However, according to Mr. Taylor, Mr. Jack Bishop looks at hazardous waste containers on a daily basis.

## **VII. CLOSING CONFERENCE**

Prior to departing, the inspector informed Mr. Taylor that EPA will need to evaluate Keener's generator status in order to determine Keener's compliance with RCRA. The inspector explained that regulatory standards for hazardous waste generators are dependent on the quantity of waste generated per month. The inspector also informed Mr. Taylor of the isocyanate label on one of the containers present in the outdoor storage area.

The inspector departed the facility at 11:12 a.m.

## **Attachment**

### **A. Inspection Photographs**



## Attachment A: Photographs for Keener Corporation (IND990735219), Connersville, Indiana

**Photo Number** 1

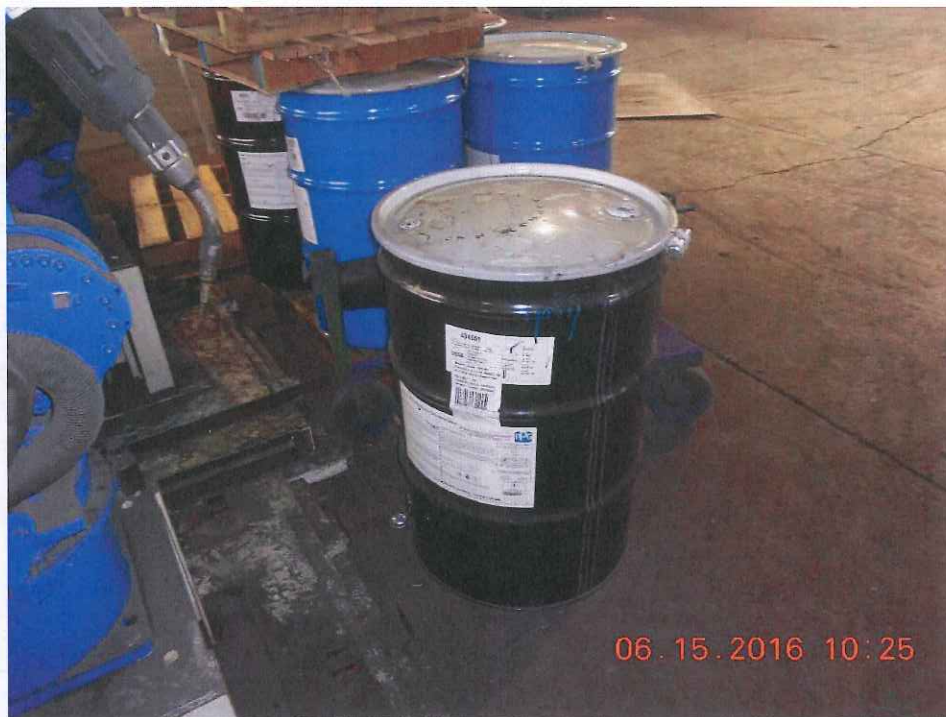
**Photo Filename** DSCN0875.JPG

**Date/Time** 6/15/2016  
10:25:08 AM

**Photographer** Todd Brown

### Description

Container of waste paint located near a paint booth (black container). See photograph 2 for a picture of the label.



**Photo Number** 2

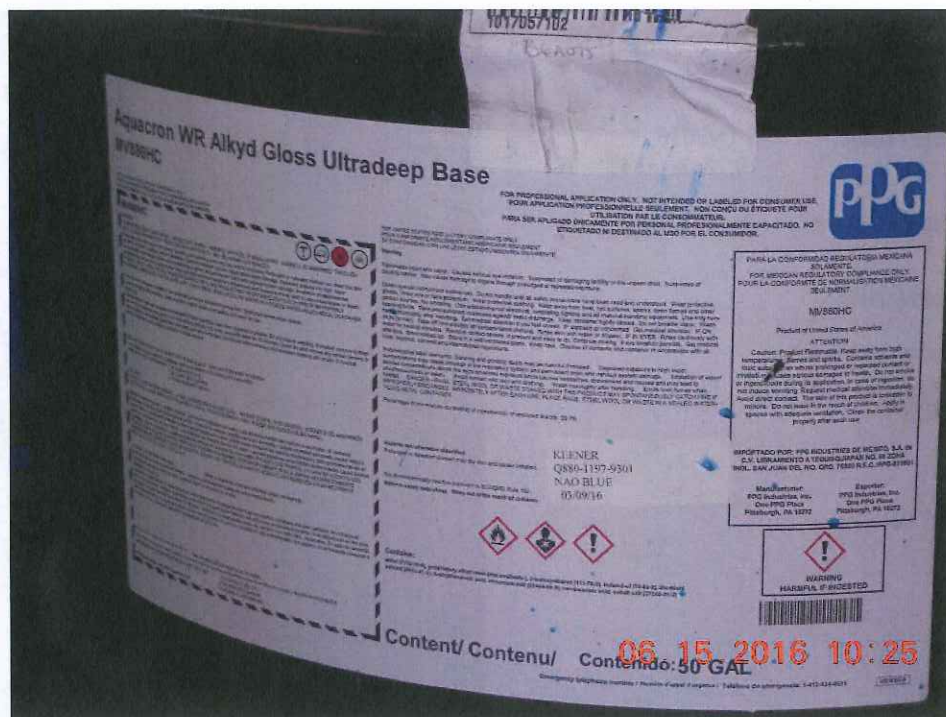
**Photo Filename** DSCN0876.JPG

**Date/Time** 6/15/2016  
10:25:22 AM

**Photographer** Todd Brown

### Description

Label on the container featured in photograph 1.





## Attachment A: Photographs for Keener Corporation (IND990735219), Connersville, Indiana

**Photo Number** 3  
**Photo Filename** DSCN0877.JPG  
**Date/Time** 6/15/2016  
10:27:54 AM  
**Photographer** Todd Brown

**Description**

Welding stations.



**Photo Number** 4  
**Photo Filename** DSCN0878.JPG  
**Date/Time** 6/15/2016  
10:28:08 AM  
**Photographer** Todd Brown

**Description**

Two paint booths.





## Attachment A: Photographs for Keener Corporation (IND990735219), Connersville, Indiana

**Photo Number** 5  
**Photo Filename** DSCN0879.JPG  
**Date/Time** 6/15/2016  
10:28:22 AM  
**Photographer** Todd Brown

### Description

Bucket in paint booth featured in photograph 4.



**Photo Number** 6  
**Photo Filename** DSCN0880.JPG  
**Date/Time** 6/15/2016  
10:30:06 AM  
**Photographer** Todd Brown

### Description

Two additional paint booths.





## Attachment A: Photographs for Keener Corporation (IND990735219), Connersville, Indiana

**Photo Number** 7

**Photo Filename** DSCN0881.JPG

**Date/Time** 6/15/2016  
10:34:52 AM

**Photographer** Todd Brown

**Description**

Refuse located outside Final Assembly Building. Gas cylinders were included (see photograph 8).



**Photo Number** 8

**Photo Filename** DSCN0882.JPG

**Date/Time** 6/15/2016  
10:35:02 AM

**Photographer** Todd Brown

**Description**

Gas cylinders among refuse featured in photograph 7.





## Attachment A: Photographs for Keener Corporation (IND990735219), Connersville, Indiana

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**Photo Number** 9  
**Photo Filename** DSCN0883.JPG  
**Date/Time** 6/15/2016  
10:44:08 AM  
**Photographer** Todd Brown

### Description

Two containers located in an outdoor area. The drums were positioned so the labels were turned inward. The red drum was labeled isocyanate DOW 3019. The blue drum was labeled Dow Styrofoam Mix 2030 Poly 01.



